

AFFIDAVIT OF BEN POLLARD

I, Ben Pollard, being of legal age, hereby deposes and states as follows:

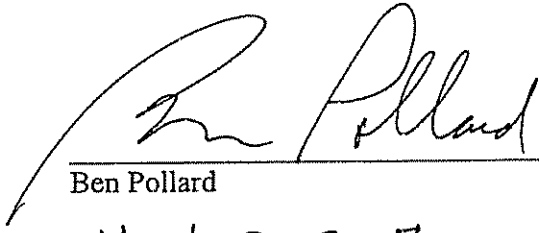
1. I am employed at the Oklahoma Conservation Commission (OCC) as the agency's assistant director.
2. I was one of the employees at OCC who supervised the collection of documents which were responsive to the Poultry Integrator's Interrogatories and Requests for Production of Documents which were served on OCC. I worked in conjunction with counsel for the State who informed me what documents had been requested by the Defendants.
3. In carrying out this task, I sought the assistance of other OCC employees within the various divisions, to locate and organize the documents sought by the Poultry Integrators.
4. The documents were pulled from the files and offices of OCC staff, placed in boxes, and moved to a location within the agency for inspection by the Poultry Integrator lawyers.
5. The documents that were provided for inspection were OCC's original documents as they are kept in the usual course of business.
6. The documents were not Bates-stamped. However, an index of types of documents was provided at the inspection for use by the Poultry Integrator lawyers. I was available, along with counsel for the State, to answer any questions posed by defense counsel inspecting the documents.
7. Prior to their inspection of OCC documents, the Poultry Integrator lawyers deposed me as an agency records custodian. During the deposition, I told them where documents were located by box and file for each Request for Production.



8. After the documents were inspected by the Poultry Integrator lawyers, the selected documents were sent out to be copied by a copying service. This process is on-going.

9. The original documents are being returned to the OCC for re-filing.

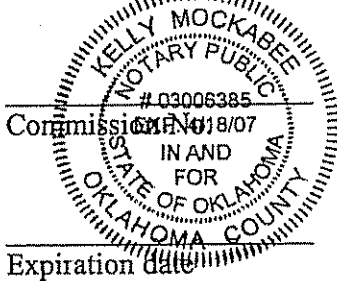
Further affiant sayeth not.

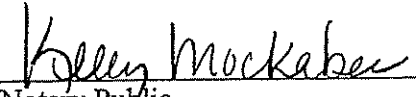

Ben Pollard

March 8, 2007
Date

State of Oklahoma)
) ss
County of Oklahoma)

On this 8th day of March, 2007, the above-referenced individual appeared before me and affixed her signature hereto.




Notary Public